→ Liz Brown 12/ P10
Please prepare a reply for my signature -
Andy

RRD # 0051-3
T/F due 12-1-03
Willow Blvd P10

Andy Hogarth, Chief
Remediation and Redevelopment Division
Michigan Department of Environmental Quality
P.O. Box 30426
Lansing, MI 48909

Dear Andy,

Thank you for attending the September 28 meeting at which Dayle Harrison and Kay Chase presented the views of the Kalamazoo Environmental Council and Kalamazoo River Protection Association on critical choices facing your agency and the Department of Natural Resources in cleaning up the Kalamazoo River. MEC joins with those two groups in urging you to advocate strongly a permanent remedy that will remove ***all*** PCB contaminated sediments consistent with the U.S. EPA in-stream cleanup standard of .5 parts per million above the River's impoundments and restore critical habitat.

As you know, there are approximately 250,000 pounds of PCBs, a persistent toxic cancer-causing chemical, in 2.5 million cubic yards of river and floodplain sediments. Fish consumption advisories warning anglers and their families not to eat fish from the river have been in place since the mid 1970s and will continue far into the future unless the PCBs are removed from the River, and, further, bald eagles and other wildlife are not reproducing.

We are deeply concerned that the preferred remedy to be proposed by U.S. EPA may be woefully inadequate, leaving the Otsego City Dam impoundment and the Plainwell Dam impoundment as permanent PCB-contaminated areas in and along the banks of the river and leave the dams in place forever. This is wholly unacceptable environmentally and is inconsistent with the policies and statutes of this state.

We support the removal of PCBs outside of the current boundaries of the former impoundments and the removal of the DNR dams along with PCB contamination above the former impoundments consistent with EPA's in-stream standard.

We are persuaded by the community's vision of a free flowing river from the City of Kalamazoo to downtown Allegan, and from the Allegan Dam to the mouth of the Kalamazoo at Saugatuck. This would require the removal of the City of Otsego dam as well as the three DNR dams. Communities in Kalamazoo and Allegan counties will gain millions of dollars annually in tourism revenues if this goal is achieved through dam removal and contaminated sediment cleanup.

We believe U.S. EPA is more likely to support a complete cleanup at the four dams if the State of Michigan refuses to leave miles of publicly owned waterfront along the river as permanent toxic sites and if the State of Michigan can demonstrate that monies are available and set aside to remove the dams.

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We therefore respectfully request that you work to set aside the necessary funding to assure the acquisition of the City of Otsego Dam and future removal of the Plainwell and City of Otsego dams and any uncontaminated sediments underneath the PCB contamination at the impoundments. Removal of the other two DNR-owned dams and associated sediments should constitute a second phase in this program.

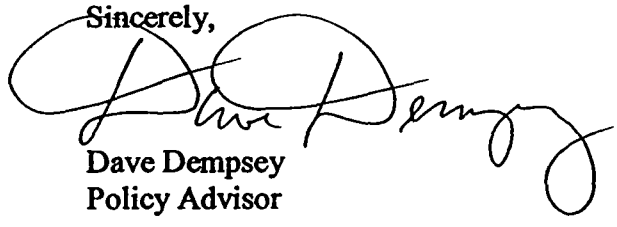
The Willow Boulevard and A-site Operable Unit proposed plan should be released and require that the existing steel wall and riprap materials (currently in the river) be removed and that the contamination be removed and placed at least 300 feet upland of the existing wall and that a natural wildlife habitat green belt at least 200 feet in width be established to restore the biological and aesthetic feature for this stretch of river for the benefit of wildlife and tourism.

We hope you will urge EPA to move forward concurrently with the Proposed Plan for the Plainwell and City of Otsego impoundment. A review of the scientific data relating to PCBs in fish and sediments cleanly indicates that there are no sources of upstream contamination that would re-contaminate the river downstream. As a result, there is no logical reason not to move in a timely way. We do recognize that some areas upstream will need remediation; however, the levels and volumes of PCBs at those locations will likely not re-contaminate the area downstream, if there is a major flooding event.

Finally, we support the local groups' position that cleanup standards must be consistent with wildlife ecological risk assessment, human health assessment, and protection of property values. All PCB-contaminated waste must be disposed of off site in approved landfills. No landfills should be allowed adjacent to the river, the DNR impoundments, Lake Allegan or the backwaters above the City of Allegan Dam and the City of Otsego Dam. All wetlands and other significant natural resources must be restored as part of the final remedial action at these sites.

The Kalamazoo River has been a symbol of the state's historic environmental neglect for half a century or more. It is our hope that with the community, DEQ and DNR working in unison to seek a permanent remedy of this kind, the River can become a symbol of recovery and hope for the future. We look forward to working with you to that end.

Sincerely,



Dave Dempsey
Policy Advisor

Cc: George Burgoyne, Deputy Director, MDNR

notes and observations from the Sept. 28, 1994 citizens advisory committee meeting (CAC) held in Plainwell.

Pat McGuire in describing the surface characteristics of the A-Site and Willow, described the vegetation cover and habitat type as a "moderate wetland". This was immediately responded to with the question "what is a moderate wetland?".

A question was asked about the porous nature of the peat layer identified as underlying the paper waste, as shown on the east/west transect. I think the question was about whether the contaminates could pass through this peat layer. Pat M. responded that the peat was heavily organic and relatively tight so water and pollutants would not move easily through this material.

Regarding the slop of the paper waste, is there erosion from the sides of the waste. Pat M. responded that the waste was fairly densely vegetated. This opinion was defended by one of the meeting participants. But it was refuted by others who said that although there is grass growing on the waste it is not densely vegetated and it is possible to see the paper waste through the vegetation.

Pat M. continued to talk about the paper waste being placed in this area at a time when the King Mill was operating and the Kazoo River was at a lower level because the mill was drawing large amounts of water out of the river. This comment was made in connection with the discussion of erosion. The meeting participants wanted to know also if erosion occurred when the river was at a high level.

There were questions about how thick and continuous the peat layer was since the north/south transect didn't show the peat layer.

Benzene was found in the samples of groundwater or native soils below the A-site. There were questions about what the source might be and whether the PRPs were looking for the source or planning to do sampling that would identify where the source might be. This lead to some discussion of the groundwater flow vectors, the pressure gradient below the site, the possibility that benzene may be moving with the GW. Questions were also asked about if the sample depth, where the benzene was found, was below the river. What is the elevation of the river verses the sampling point in question.

More discussion of the benzene. The comment was made that if the benzene contaminated soil is below the GW than the GW must be contaminated.

The level of detection for PCBs was brought up by Dyale Harrison. The RI work plan called for a detection limit of 1.0. The state PCB detection limit for groundwater is 0.2. Why wasn't 0.2 used. When is the state going to start to require 0.2. Using the 1.0 detection limit isn't good enough to allow the contractor to conclude that if PCBs were non detect at a sampling point then they don't exist. They may exist at 0.8 or 0.6, how do you know unless you look for them using 0.2 detection limit.

Regarding the hot spot at AMW3?, A-site. Wouldn't it be necessary to put in more wells around that spot to see just how far out from that spot the contaminant extends. It may be necessary to put in a well about 700 feet to the west to measure background or determine if benzene is moving in the groundwater, which

has been identified as moving from west to east.

Mary Brown was concerned about venting of the contaminated GW. Pat McGuire explained that there was no data on if GW was venting to the river. It would take considerable modeling which is not part of this data gathering activity.

Someone asked if DNR had commented on the benzene concentrations.

Mary G responded that the DNR has not received the final RI and is still evaluating the data.

Discussion of the Willow Blvd. hot spot that extends from the surface to the native soils below the waste. Is the consultant/PRPs planning on going back there to sample. Committee participants and complaining that there is not enough information available to allow the PRPs to draw conclusions about the extent of the contamination.

At this point I would say the committee participants are beginning to demand that the PRPs go back and get more information.

Mary Brown wanted to know if the contaminated soils, that are in the GW, will these soils be removed.

There was discussion and more questions about whether the PRPs were going to go back and do more sampling.

In my opinion the committee is approaching a point of veto. At this point if there is nothing done to address the concerns of the committee, more definition of the extent of the problem, the committee will work to veto any proposal put forth. The committee is complaining that the data isn't good enough and isn't complete.

There was discussion of Davis creek and the high concentration of PCBs found upstream of the paper waste. Was this the result of runoff that entered the stream bed than was pushed back upstream by high water levels in the Kazoo River or was this high number the result of some off site source. Why wasn't more sampling done upstream to see how far this contamination extends. Is the PRP ready to except responsibility for this contamination as far upstream as it may extend. Because if they are not than they had better do more sampling to determine if the PCBs came from the site or from some other source.

There was discussion of the sampling that was done in the sediments in the river adjacent to the Willow. Pat explained that a probe was used to collect the samples several feet out in the river. The committee participants complained that the sampling didn't go far enough to determine how far out into the river the PCBs extended. The results of the limited sampling indicate that PCBs exist at levels of concern as far out as the samples were collected.

The committee participants asked that at future meetings they be provided with handouts of the overheads, particularly the ones that identify well locations and sample results.

Comments form me, Include in the meeting announcement letter when the tech memo and RI will be available. make sure we have handouts for the next meeting.